

Document Log Item

Addressing	
From	To
"Chan, Victor M." <VMChan@SolanoCounty.com>	Adam Freedman/R9/USEPA/US@EPA "Ferrario, Nedzlene N." <NNFerrario@SolanoCounty.com>
CC	BCC
David Albright/R9/USEPA/US@EPA George Robin/R9/USEPA/US@EPA	
Description Form Used: Memo	
Subject	Date/Time
RE: Blow-Out Prevention Permit Language	2F\
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0	10,891
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Comments	

Body

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Adam. There are discussions in SolanoCounty about having a MOU between SolanoCounty and US EPA to prevent regulatory duplication. For example, our Use permit may state: "Blowout prevention is required and must be consistent with the US EPA permit." There are other issues that require clarification. If you are receptive to an MOU, this may streamline the process. Vic

From: Freedman.Adam@epamail.epa.gov [mailto:Freedman.Adam@epamail.epa.gov]
Sent: Friday, January 29, 2010 5:02 PM
To: Chan, Victor M.; Ferrario, Nedzlene N.
Cc: Albright.David@epamail.epa.gov; Robin.George@epamail.epa.gov
Subject: Blow-Out Prevention Permit Language

Victor and Ned,

I wanted to show you how our current permit language addresses blow-out prevention (BOP), as I noted that your information request of Shell includes specifics pertaining to their BOP design. The language is draft and subject to change during our permit writing process.

1. Drilling, Work-over, and Plugging Procedures

Drilling, work-over, and plugging procedures must comply with the CDOGGR “Onshore Well Regulations” of the California Code of Regulations, found in Title 14, Natural Resources, Division 2, Department of Conservation, Chapter 4, Article 3, Section 1722-1723. Drilling procedures shall also include the following:

- (a) Details for staging long-string cementing or justification for cementing without staging;
- (b) Records of daily Drilling Reports (electronic and hard copies);
- (c) **Blowout Preventer (BOP) System testing on recorder charts including complete explanatory notes during the test(s),**
- (d) Casing and other tubular and accessory measurement tallies; and
- (e) Details and justification for any open hole gravel packing.

The "Onshore Well Regulations" that we cite in our permit may be found at <ftp://ftp.consrv.ca.gov/pub/oil/regulations/PRC04.PDF>-- and the applicable language is on page 29, with specific guidances on design found in DOGGR publication No. MO 7, as noted below.

1722.5. Blowout Prevention and Related Well Control Equipment.

Blowout prevention and related well control equipment shall be installed, tested, used, and maintained in a manner necessary to prevent an uncontrolled flow of fluid from a well. Division of Oil, Gas, and Geothermal Resources publication No. MO 7, "Blowout Prevention in California," shall be used by Division personnel as a guide in establishing the blowout prevention equipment requirements specified in the Division's approval of proposed operations.

Please let me know if you have any further questions and I would be happy to discuss them.

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